

Zavislan shows a manually operated device for applying energy to selected areas under the skin. As the Examiner has noticed, there is no automatic determination of target position by the device.

The Examiner has attempted to correct deficiencies of Zavislan with reference to Asah. Asah does not have an image sensor. Instead Asah's device detects a tissue parameter such as texture, elasticity, size, or shape. The detector mechanism is discussed with respect figure 4 in column 12, lines 34-50. This detecting mechanism shines light beams onto the target, reflects them off the target, and directs them to an intensity detector 110. No image is formed. Accordingly, Asah has no teaching or suggestion of a control unit that would use an image to target a laser source.

The automation technique of Asah only applies to the kind of point-by-point instantaneous intensity detection in the device of Asah. This automation technique would be non-functional in an image-forming device. Asah can only be combined with Zavislan to arrive at the claimed invention through impermissible hindsight in view of Applicants' disclosure.

Moreover, both Asah and Zavislan are similarly deficient in failing to teach or suggest detecting the position of a hair in order to target a laser source in a hair removal device. Instead, both references to teach detecting a follicle, not a hair.

Claim 15 is analogous.

Therefore, the Examiner has still failed to present a prima facie case of obviousness, even with respect to the independent claims.

**Dependent claims**

Applicants respectfully submit that, while the rejections of the independent claims have been clarified, the rejections of the dependent claims have not been clarified. Accordingly, Applicants respectfully submit that the rejections of the dependent claims continue to fail to satisfy 37 CFR 1.104.

The Examiner has not indicated where any of the limitations of the dependent claims may be found in the references. For instance, where do the references teach or suggest using a partial region having dimensions determined by a previously determined average distance between hairs and previously determined length of hairs, as recited in Claim 2? The other dependent claims recite further patentable distinctions over the references.

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Applicants respectfully submit that they have answered each issue raised by the Examiner and that the application is accordingly in condition for allowance. Allowance is therefore respectfully requested.

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Respectfully submitted,

By *A. E. Barschall*  
Anne E. Barschall, Reg. No. 31,089  
Tel. no. 914-332-1019  
Fax no. 914-332-7719  
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